

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:** John Conroy / John White  
**Title:** Vice President / Exec. Director

**REQUEST:** AT&T, Set #1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-2 For each wire center identified in response to ATT-VZ-1, please provide the total number of voice-grade equivalent lines served by Verizon's switch on a DS0 voice grade equivalent basis, and please subdivide that total into the following categories:

- (a) the total number of enterprise customers of Verizon served through such switch, and the total number of loops on a DS0 voice grade equivalent basis serving such customers;
- (b) the total number of enterprise customers of any CLEC served on a UNE-P basis through such switch, and the total number of loops on a DS0 voice grade equivalent basis serving such customers;
- (c) the total number of mass market small business customers of Verizon served through such switch, and the total number of loops on a DS0 voice grade equivalent basis serving such customers;
- (d) the total number of mass market small business customers of any CLEC served on a UNE-P basis through such switch, and the total number of loops on a DS0 voice grade equivalent basis serving such customers;
- (e) the total number of mass market residential customers of Verizon served through such switch, and the total number of loops on a DS0 voice grade equivalent basis serving such customers; and
- (f) the total number of mass market residential customers of any CLEC served on a UNE-P basis through such switch, and the

total number of loops on a DS0 voice grade equivalent basis serving such customers;

**REPLY:**

(a) The information requested is not readily available and would require a special study. Verizon MA does not separately track the number of customers or voice grade equivalent lines for retail enterprise vs. retail mass market business customers.

(b) The information requested regarding the number of enterprise customers is not available. Verizon MA does not track the number of enterprise customers served by CLECs. The number of DS1 and above UNE-Ps are provided on the proprietary Attachment attached hereto. The data is as of June 30, 2003. The data contained in this Attachment is proprietary, confidential and competitively sensitive and is being provided to the Department and to parties in accordance with the terms of the Department's Protective Order.

(c) The information requested is not readily available and would require a special study. Verizon MA does not separately track the number of customers or voice grade equivalent lines for retail enterprise vs. retail mass market business customers.

(d) The information requested regarding the number of mass market customers is not available. Verizon MA does not track the number of mass market customers serviced by CLECs. The number of UNE-Ps, excluding DS1 and above are provided on the proprietary Attachment. The data is as of June 30, 2003.

(e) Please see the proprietary Attachment for the Total Residence access lines served by Verizon MA as of June 30, 2003.

(f) Please see the proprietary Attachment for the Total Residential UNE-P lines being provided to CLECs as of June 30, 2003.

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**REQUEST:** AT&T, Set #1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-3 For each CLEC that Verizon claims in its Initial Panel Testimony regarding Mass Market Switching (dated November 14, 2003) is a self-provider of switching to serve mass market customers in Massachusetts, please provide the following information with respect to each Verizon wire center area within which Verizon claims that the CLEC is a self-provider of mass market switching, in manipulable electronic form (e.g., Excel spreadsheet), and for all line count information please also provide subtotals for each MSA and each density zone, as well as statewide totals, by CLEC:

- (a) The 11-digit Common Language Location Identifier (“CLLI”) code of each wire center area in which Verizon claims that the CLEC self-provisions switching.;
- (b) the Metropolitan Statistical Area (“MSA”) within which the wire center area is located;
- (c) The UNE rate density zone within which the wire center area is located;
- (d) The number of stand-alone UNE loops in each wire center that Verizon identified in its “Line Count Study” from Verizon’s internal databases (see Testimony p.18);
- (e) The number of stand-alone UNE loops in each wire center that “bypass Verizon MA’s network” and which Verizon identified from “residential listings in the E911 database” (see Testimony p.18);
- (f) The number of stand-alone UNE loops in each wire center that Verizon identified from any source other than its “Line

Count Study” or “residential listings in the E911 database”  
(see Testimony p.18);

- (g) The total number of the loops identified in response to parts (d), (e), and (f), and an explanation for any variance between these totals and the summary figures provided in Attachment 2 to Verizon’s Initial Panel Testimony regarding Mass Market Switching (dated November 14, 2003)
- (h) To the extent that Verizon has information regarding which of the loops identified in response to parts (d), (e), (f), and (g) above are used to provide service to residential customers, provide the total number of such residential loops by wire center area, with subtotals for each MSA and each density zone, and statewide totals; and
- (i) To the extent that Verizon has information regarding which of the loops identified in response to parts (d), (e), (f), and (g) above are used to provide service to small business customers, provide the total number of such small business loops by wire center area, with subtotals for each MSA and each density zone, and statewide totals.

**REPLY:**

(a – e) Please see Verizon MA’s proprietary attachment to AG 1-2.

(f) None

(g) No variance.

(h) The Line Count Study does not differentiate between residential mass market customers and small business mass market customers. For the E911 portion of the study, please see response to (a-e).

(i) The information requested is not available. The Line Count Study does not differentiate between residential mass market customers and small business mass market customers.

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**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-4 Please provide, in manipulable electronic form (e.g., spreadsheets), copies of all underlying source data, exhibits, tables, maps, spreadsheets, programs, and all other supporting data and source materials for Attachments 1, 2, and 3 to Verizon's Initial Panel Testimony.

**REPLY:** Attachment 1 and 3 to Verizon MA's Initial Panel testimony were developed using a mapping software known as MapInfo software (<http://www.mapinfo.com>). The source of the data for Attachment 1 is the February 2003 LERG, which is publicly available. Attachment AT&T 1-4 provides the data fields from the LERG that were used to create the map. Attachment 2 and the data for Attachment 3 are based on the data contained in response AG 1-2.

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**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-5 For each CLEC that Verizon has identified in its Initial Panel Testimony regarding Mass Market Switching (dated November 14, 2003) as a self-provider of switching to serve mass market customers, please provide the following information about the CLEC's retail business customers who are served by 24 or fewer DS0 loops at a single location.

- (a) Specify the number of business customers served by the CLEC by the number of such DS0 loops (i.e., identify the number of business customers with a single loop, with two loops, three loops, etc., through 24 loops).
- (b) Specify, for each wire center where Verizon claims the self-provisioning trigger for mass market switching has been met, the number of business customers served by the CLEC by the number of DS0 loops, according to the following groupings:
  - (i) The number of business customers with 1 to 4 lines,
  - (ii) The number of business customers with 5 to 8 lines,
  - (iii) The number of business customers with 9 to 16 lines, and
  - (iv) The number of business customers with 17 to 24 lines.

**REPLY: (cont'd)**

- (a) As described in Verizon MA's initial testimony, the Line Count Study identifies, by wire center, all CLECs leasing loops from Verizon MA below the DS1 level at each customer address. The study does not distinguish between residential and business customers. Such an analysis is not necessary to meet the FCC's trigger for mass market switching.
- (b) Please see Response to (a) above.

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**REQUEST:** AT&T Set 1

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**ITEM:** AT&T 1-6 With respect to each CLEC claimed by Verizon to be a self-provider of switching in Massachusetts, produce any and all documents substantiating that claim.

**REPLY:** Verizon MA's direct testimony describes the evidence used by Verizon MA in its analysis. See, for example, Direct Testimony of John Conroy and John White page 16-26, Attachment 1, the proprietary versions of Attachment 2, and Attachment 4. See also the line count study and the E911 study provided in response to AG 1-2. Finally, to the extent that CLECs have responded to the Department's discovery, the responses have been consistent with Verizon's line count and E911 studies.